



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

The Honorable Sydnee Dickson
State Superintendent of Public Instruction
Utah State Office of Education
250 East 500 South, PO Box 144200
Salt Lake City, UT 84114

March 13, 2017

Dear Superintendent Dickson:

Thank you for your participation in the U.S. Department of Education's (the Department) assessment peer review process under Title I of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the No Child Left Behind Act of 2001 (NCLB). The Every Student Succeeds Act (ESSA) maintains the essential requirements from NCLB that each State annually administer high-quality assessments in at least reading/language arts, mathematics, and science that meet nationally recognized professional and technical standards. Therefore, as you know, the Department reinstituted peer review of state assessment systems so that each State receives feedback from external experts on the assessments it is currently administering. We appreciate the efforts required to prepare for the peer review, which occurred in June and August 2016. State assessment systems provide essential information that States, districts, principals, and teachers can use to identify the academic needs of students, target resources and supports toward students who need them most, evaluate school and program effectiveness, and close achievement gaps among students. A high-quality assessment system also provides useful information to parents about their children's advancement against and achievement of grade-level standards. The Department's peer review of State assessment systems is designed to provide feedback to States to support the development and administration of high-quality assessments.

On October 6, 2016, the Department sent a letter to chief State school officers outlining the outcomes for States related to the assessment peer review. I am writing to provide you feedback on your State's recent submission of evidence. External peer reviewers and Department staff evaluated the Utah State Office of Education's (USOE) submission and found, based on the evidence received, that the components of your assessment system met some, but not all of the statutory and regulatory requirements of section 1111(b)(1) and (3) of the ESEA, as amended by NCLB. Based on the recommendations from this peer review and our own analysis of the State's submission, I have determined the following:

- Reading/language arts (R/LA) and mathematics general assessments in grades 3-8. **Substantially meets requirements.**
- R/LA and mathematics general assessments in high school. **Substantially meets requirements.**
- R/LA and mathematics AA-AAAS in grades 3-8 and high school (Dynamic Learning Maps, Integrated Model, DLM-IM). **Substantially meets requirements.**
- Science general assessments in grades 3-5 and 6-9. **Substantially meets requirements.**
- Science general assessments in high school. **Partially meets requirements.**

400 MARYLAND AVE., SW, WASHINGTON, DC 20202
<http://www.ed.gov/>

The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

The components that **substantially meet requirements** meet most of the requirements of the statute and regulations but some additional information is required. The Department expects that USOE should be able to provide this additional information within one year.

The components that **partially meets requirements** does not meet a number of the requirements of the statute and regulations and USOE will need to provide substantial additional information to demonstrate it meets the requirements. The Department expects that USOE may not be able to submit all of the required information within one year.

The specific list of items required for USOE to submit is enclosed with this letter. Because some of the State's components have partially met the requirements, the Department is placing a condition on the State's Title I grant award related to those components of the assessment system. To satisfy this condition, USOE must submit satisfactory evidence to address the items identified in the enclosed list. USOE must submit a plan and timeline within 30 days outlining when it will submit all required additional documentation for peer review. The Department will also host regular (e.g., quarterly) progress calls with the State to discuss the State's progress on its timeline. If, following the peer review of the additional evidence, adequate progress is not made, the Department may take additional action. Additionally, the Office of Special Education and Rehabilitative Services (OSERS) will monitor progress on matters pertaining to requirements in the Individuals with Disabilities Education Act (IDEA) related to the participation of students with disabilities in Title I assessments. Insufficient progress to address such matters may lead OSERS to place a condition on USOE's IDEA Part B grant award.

In addition, the full peer review notes from the review are enclosed. These recommendations to the Department formed the basis of the Department's determination. Please note that the peers' recommendations may differ from the Department's feedback; we encourage you to read the full peer notes for additional suggestions and recommendations for improving your assessment system beyond what is noted in the Department's feedback. Department staff will reach out to your assessment director in the next few days to discuss the peer notes and the Department's determination and to answer any questions you have.

Thank you for your ongoing commitment to improving educational outcomes for all students. I look forward to our continued partnership as we move ahead with this critical work. I appreciate the work you are doing to improve your schools and provide a high-quality education for your students. If you have any questions, please contact Porscheoy Brice or Jameel Scott of my staff at: OSS.Utah@ed.gov.

Sincerely,

/s/

Monique M. Chism Ph.D
Acting Assistant Secretary
Elementary and Secondary Education

Enclosures

cc: Jo Ellen Shaeffer, Assessment Director

Critical Elements Where Additional Evidence is Needed to Meet the Requirements for Utah's Assessment System

Critical element	Additional Evidence Needed
1.1 – State Adoption of Academic Content Standards for All Students	For the science general assessments in grade spans 3-5, 6-9 and 10-12, USOE must provide: <ul style="list-style-type: none"> Evidence of formal adoption of the State's 2012 revised Earth Science standards.
1.2 – Coherent and Rigorous Academic Content Standards	For the science general assessments in grade spans 3-5, 6-9 and 10-12, USOE must provide: <ul style="list-style-type: none"> Evidence of coherent and rigorous academic content standards in science in high school. Evidence of a timeline for implementation of science standards in high school.
1.3 – Required Assessments	For the science general assessments in grade spans 10-12, USOE must provide: <ul style="list-style-type: none"> Evidence that clearly indicates which science test in high school is required for all students, or it must provide evidence that confirms that all four science tests are required for all students in high school.
1.4 – Policies for Including All Students in Assessments	For the science general assessments in grade spans 10-12, USOE must provide: <ul style="list-style-type: none"> Evidence of inclusion policies that clearly indicates which science test in high school is required for all students, or it must provide evidence that of inclusion policies that confirms that all four science tests are required for all students in high school.
1.5 – Participation Data	For the science general assessments in grade spans 10-12, USOE must provide: <ul style="list-style-type: none"> Evidence that clearly indicates the participation of all students in the one science test in high school that the State requires for all students, or evidence that clearly indicates the participation of all students in all four science tests that are required for all students in high school.
2.1 – Test Design and Development	For the R/LA and mathematics general assessments in grades 3-8 and HS, and Science general assessments in grade spans 3-5, 6-9 and 10-12, USOE must provide: <ul style="list-style-type: none"> Evidence that State has plan addressed the need to increase the item pool and to improve the precision of the computer-adaptive (CAT) algorithms used. Evidence that the R/LA assessment design measures the full breadth and depth of the State's R/LA academic content standards, including the speaking and listening aspect of the standards. <p>For the DLM IM AA-AAAS, USOE must provide:</p> <ul style="list-style-type: none"> See evidence requested under elements 3.1 and 4.1 below.
2.4 – Monitoring Test Administration	For the entire USOE assessment system, including both general and alternate assessments, USOE must provide: <ul style="list-style-type: none"> Evidence that monitoring of test administration is implemented in districts and schools throughout the State (e.g., include reports or summaries of findings of monitoring of test administrations for special populations, or a summary of findings and appropriate action steps

Critical element	Additional Evidence Needed
	following findings from such monitoring).
2.5 – Test Security	<p>For the entire USOE assessment system, including both general and alternate assessments, USOE must provide:</p> <ul style="list-style-type: none"> • Evidence of procedures for remediation following test irregularities, security breaches, or unauthorized access of the secure system.
3.1 – Overall Validity, including Validity Based on Content	<p>For the R/LA and mathematics general assessments in grades 3-8 and HS, and Science in grade spans 3-5, 6-9 and 10-12, USOE must provide:</p> <ul style="list-style-type: none"> • Evidence that State has plan addressed the need to increase the item pool and to improve the precision of the CAT algorithms used, as noted in element 2.1. • Evidence of alignment for each general assessment for R/LA grades 4, 5, 6 and 8; and mathematics grades 3, 5, 7 and 8 (i.e., in each subject assessed, for each grade assessed). <p>For R/LA and mathematics AA-AAAS in grades 3-8 and HS (DLM-IM), USOE must provide:</p> <ul style="list-style-type: none"> • Evidence of analysis that supports the assumptions of testlet interchangeability across linkage levels used by the tests, including analysis of model fit. • Evidence that provides detailed descriptions of the routing pathways within and across essential elements (content domains).
3.2 – Validity Based on Cognitive Processes	<p>For the R/LA and mathematics general assessments in grades 3-8 and HS, and science in grade spans 3-5, 6-9 and 10-12, USOE must provide:</p> <ul style="list-style-type: none"> • Evidence that the State’s assessments tap the appropriate cognitive processes for each content area at each tested grade level.
3.3 – Validity Based on Internal Structure	<p>For R/LA and mathematics AA-AAAS in grades 3-8 and HS (DLM-IM), USOE must provide:</p> <ul style="list-style-type: none"> • Evidence of consistency and accuracy of classifications resulting from the tests. • Evidence of item-level data (e.g., factor loadings or item-total correlations), or comparable node-level data that support the internal structure of the tests. • Evidence that reliability estimates are based upon known item and testlet parameters.
3.4 – Validity Based on Relationships with Other Variables	<p>For R/LA and mathematics AA-AAAS in grades 3-8 and HS (DLM-IM), USOE must provide:</p> <ul style="list-style-type: none"> • Evidence that the assessment scores are related as expected with other variables.

Critical element	Additional Evidence Needed
4.1 – Reliability	<p>For R/LA and mathematics AA-AAAS in grades 3-8 and HS (DLM-IM), USOE must provide:</p> <ul style="list-style-type: none"> • Evidence regarding reliability estimation, which will be satisfied by response to element 3.3. • Evidence regarding consistency and accuracy of classifications, which will be satisfied by response to element 3.3. • Evidence of model fit analysis, which will be satisfied by response to element 3.1.
4.4 – Scoring	<p>For R/LA and mathematics AA-AAAS in grades 3-8 and HS (DLM-IM), USOE must provide:</p> <ul style="list-style-type: none"> • Evidence of scoring reliability statistics for writing items based upon test administrator ratings. • Evidence of a detailed description of the calibration used in scoring software (e.g., field test versus operational calibration). • Evidence that distinguishes between option level scoring and item level scoring.
4.5 – Multiple Assessment Forms	<p>For R/LA and mathematics AA-AAAS in grades 3-8 and HS (DLM-IM), USOE must provide:</p> <ul style="list-style-type: none"> • Evidence of analysis that supports the assumptions of testlet interchangeability, which will be satisfied by response to element 3.1.
4.6 – Multiple Versions of an Assessment	<p>For R/LA and mathematics AA-AAAS in grades 3-8 and HS (DLM-IM), USOE must provide:</p> <ul style="list-style-type: none"> • Evidence of analysis that supports the assumptions of testlet interchangeability, which will be satisfied by response to element 3.1.
5.3 – Accommodations	<p>For the entire USOE assessment system, including both general and alternate assessments, USOE must provide:</p> <ul style="list-style-type: none"> • Evidence that the State has a process to review individually and allow exceptional requests for a small number of students who require accommodations beyond those routinely allowed.
5.4 – Monitoring Test Administration for Special Populations	<p>For the entire USOE assessment system, including both general and alternate assessments, USOE must provide:</p> <ul style="list-style-type: none"> • Evidence that monitoring consistent with this critical element is implemented in districts and schools throughout the State (e.g., include reports or summaries of findings of monitoring of test administrations for special populations, or a summary of findings and appropriate action steps following findings from such monitoring).
6.4 – Reporting	<p>For the entire USOE assessment system, including both general and alternate assessments, USOE must provide:</p> <ul style="list-style-type: none"> • Evidence that USOE follows a timeline for delivering individual student reports to parents, teachers, and principals as soon as practicable after each test administration.